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September 15, 2022

The Honorable Sanket J. Bulsara
 United States District Court
 Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, NY 11201

Re: Securities and Exchange Commission v. Vale S.A., No. 22-cv-2405 (E.D.N.Y.) (RJD) (SJB)

Dear Judge Bulsara:

Pursuant to the Court's instructions during the September 15, 2022 initial pre-trial conference in this matter, Plaintiff Securities and Exchange Commission ("SEC") and Defendant Vale S.A. ("Vale") jointly submit the enclosed revised Protective Order.

Respectfully Submitted,

/s/ Jennifer Kennedy Park
 Jennifer Kennedy Park

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cc: All Counsel of Record (via ECF)
Enclosures